

### **REMARKS/ARGUMENTS**

Claims 1-2, and 4-24 are pending in this application. Claims 1, 2, 11, 13, and 21-24 have been amended. Claim 3 is canceled. Claims 1, 2, 21, 22, and 23 are independent claims. Applicant kindly requests favorable reconsideration of the application in view of the present amendments and the following discussion.

Support for the claim amendments is found in the specification. Claim 1 is representative of limitations added to the independent claims. The first limitation, beginning "distributing links across the Internet," is found in the as-filed specification page 6, lines 11-17, and page 1 line 24 to page 2 line 4. The second limitation, beginning "receiving a request, at said marketing control engine," is found in the specification on page 6, lines 1-4. The third limitation, beginning "identifying the requestor as either," is found in the specification on page 6, lines 13-16. The fourth limitation, beginning "dynamically creating a virtual web page," is found in the specification on page 6, lines 9-12. The fifth limitation, beginning "delivering said virtual web page," is found in the specification on page 6 lines 9-12. The sixth limitation, beginning "redirecting said identified human visitor," is found in the specification on page 6 lines 1-3, and 11-17. The seventh limitation, beginning "logging redirections," is found in the specification on page 6, lines 18-22. The eighth limitation, beginning "tracking movements" is found in the specification on page 6, lines 18-22. The ninth limitation, beginning "analyzing web traffic," is found in the specification on page 2, line 27, to page 3, line 9.

#### **Claim 1**

The Examiner asked the applicant to show that claim 1 is patentable over Finch, II in view of Tripp. The amendments to claim 1 clarify the present invention and define patentable subject matter which is not taught or suggested by the combination of Finch and Tripp.

The combination of Finch and Tripp fails to teach all of the claim limitations. There are several limitations that the combination fails to teach. The first limitation of claim one is "distributing links across the Internet to improve visibility of a web site, said links created

through a marketing control engine, and wherein said links point to said marketing control engine." Both Finch and Tripp are silent on teaching distributing links that point to a marketing control engine. The fourth limitation of claim one is "dynamically creating a virtual web page wherein content of said virtual web page is tailored to a specific search engine, and wherein said virtual web page provides linking data such that a search engine search result for said virtual web page contains a URL that points to said marketing control engine." Both Finch and Tripp are silent on teaching creating virtual web pages that result in search engine results that point back to a marketing control engine. The sixth limitation teaches redirecting human visitors from a link that points to a marketing control engine, to an existing web site of an online marketer. Both Finch and Tripp are silent on such redirection. The ninth limitation teaches analyzing web traffic through the marketing control engine. Both Finch and Tripp are silent on analyzing web traffic through a marketing control engine.

The combination of Finch and Tripp is erroneous because Tripp teaches away from the claimed invention. Tripp teaches using a "bottom-up" approach to search engine indexing. (Tripp, Abstract). Instead of dealing with search engine spiders, Tripp teaches that web site owners send web content directly to a search engine. The present invention, however, teaches a method that deals with search engine spiders to index web content. Because Tripp teaches away from the invention there is no motivation to combine the references, and thus the references should not be combined.

Applicant submits that the amendments to claim 1 patentably distinguish the claimed invention from the prior art references. Claim 1 is therefore in condition for allowance.

#### **Claims 2, 4-6, 11, 12, 19, and 21-24**

The Examiner asked the applicant to show that claims 2, 4-6, 11, 12, 19, and 21-24 are patentable over Finch, II in view of Yacoby. The amendments to claims 2, 11, and 21-24 clarify the present invention and define patentable subject matter which is not taught or suggested by the combination of Finch and Yacoby.

The combination of Finch and Yacoby fails to teach all of the claim limitations. There are several limitations that the combination fails to teach. Independent claim 2 is representative of this set of claims. The first limitation of claim 2 is "distributing links across

the Internet to improve visibility of a web site, said links created through a marketing control engine, and wherein said links point to said marketing control engine." Both Finch and Yacoby are silent on teaching distributing links that point to a marketing control engine. Yacoby teaches linking, but in the context of linking telephone numbers to web pages. The fourth limitation of claim one is "dynamically creating a virtual web page wherein content of said virtual web page is tailored to a specific search engine, and wherein said virtual web page provides linking data such that a search engine search result for said virtual web page contains a URL that points to said marketing control engine." Both Finch and Yacoby are silent on teaching creating virtual web pages that result in search engine results with URLs that point back to a marketing control engine. The sixth limitation teaches redirecting human visitors from a link that points to a marketing control engine, to an existing web site of an online marketer. Both Finch and Yacoby are silent on such redirection. Thus the amendments to claim 2 patentably distinguish the present invention over the prior art combination, and is therefore in condition for allowance.

Independent claims 21, 22, and 23 have similar limitations as claim 2 and thus patentably distinguish over the combination of Finch and Yacoby for the same reasons listed above. Claim 21, 22, and 23 are therefore in condition for allowance. Dependent claims 4-6, 11, 12, 19, and 24 incorporate all of the limitations of the independent claims upon which they depend. Since independent claims 2 and 23 patentably distinguish over the prior art combination, then dependent claims 4-6, 11, 12, 19, and 24 also patentably distinguish over the prior art combination and are therefore in condition for allowance.

### **Claims 13-18, and 20**

The Examiner asked the Applicant to show that claims 13-18, and 20 are patentable over Finch, II in view of Tripp, and further in view of Yacoby. Dependent claims 13-18, and 20 depend on independent claim 2. The amendments to independent claim 2 clarify the present invention and define patentable subject matter which is not taught or suggested by the combination of Finch, Tripp, and Yacoby. Dependent claims 13-18, and 20 incorporate all of the limitations of claim 2, and are thus allowable if claim 2 is allowable.

As discussed above, the combinations of (1) Finch and Tripp, and (2) Finch and Yacoby do not teach or suggest all the claim limitations of the amended invention. Likewise, the combination of Finch, Tripp, and Yacoby does not teach or suggest all of the

claim limitations of the amended invention. Finch, Tripp, and Yacoby are all silent on several limitations of the present invention. The combination of these three references does not teach: distributing links across the Internet that point to a marketing control engine, dynamically creating optimized web pages that point to a marketing control engine; and redirecting humans, that follow such links, to an existing web site. Thus dependent claims 13-18, and 20 patentably distinguish over the prior art combination and are therefore in condition for allowance.

### **Claims 7-10**

The Examiner asked the Applicant to show that claims 7-10 are patentable over Finch, II in view of Tripp, and further in view of Chiu. Dependent claims 7-10 depend on independent claim 2. The amendments to independent claim 2 clarify the present invention and define patentable subject matter which is not taught or suggested by the combination of Finch, Tripp, and Chiu. Dependent claims 7-10 incorporate all of these limitations, and are thus allowable.

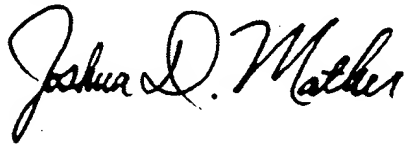
As discussed above, the combination of Finch and Tripp does not teach or suggest all the claim limitations of the present invention. Adding Chiu to the combination does not teach or suggest all of the claim limitations of the amended invention. Chiu is directed to a method for post-authoring linking, i.e. appending additional information to web documents. (Chiu, col. 2, ln. 56-60.) Finch, Tripp, and Chiu are all silent on several limitations of the present invention. The combination of these three references fails to teach: distributing links across the Internet that point to a marketing control engine, dynamically creating optimized web pages that point to a marketing control engine; and redirecting humans, that follow such links, to an existing web site. Thus dependent claims 7-10 patentably distinguish over the prior art combination and are therefore in condition for allowance.

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### Summary

For all the reasons advanced above, Applicant respectfully submits that the application is in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully Submitted,

A handwritten signature in black ink, reading "Joshua D. Mather". The signature is written in a cursive, flowing style.

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